

Exhibit N

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December 6, 2018

VIA EMAIL

Mr. John C. McElwaine
Nelson Mullins Riley & Scarborough LLP
101 Constitution Avenue, N.W.
Suite 900
Washington, DC 20001

Re: Fraudulent Actions by Micfo, LLC

Dear Mr. McElwaine:

We write on behalf of the American Registry for Internet Numbers, Ltd. (“ARIN”). ARIN is conducting a review of Micfo, LLC’s (“Micfo”) actions and determined that Micfo has—through fraudulent means—obtained from ARIN rights to a significant amount of Internet number resources. ARIN demands that Micfo, its CEO, Mr. Amir Golestan, and any affiliated “alias” individuals and companies agree to a revocation of all IP number resources in Attachment A that have not yet been transferred to other entities.

In light of ARIN’s review and the information made available in the civil lawsuit filed by Micfo in the United States District Court for the District of South Carolina, *Micfo v. Erinn Larkin and Victoria Latham*, No. 2:18-cv-01653-DCN, it is clear that your client has intentionally defrauded ARIN on numerous occasions and financially benefitted from that fraud by selling the rights to resources. Micfo and Mr. Golestan, in their respective answers to the counterclaim filed by Ms. Latham—Mr. Golestan’s former personal assistant at Micfo—your client has admitted to fabricating the names of entities and creating fraudulent documents that were provided to ARIN. See Micfo Answer, ECF 25 at ¶¶ 12, 13, 19; Golestan Answer, ECF 33 at ¶¶ 12, 13, 19. Through numerous corporations established several years and purchased by your client (i.e. shelf entities), including but not limited to the entities identified in Attachment A, your client engaged in a pattern of conduct aimed at defrauding ARIN by submitting false and fabricated documentation. This documentation including likely false or forged signatures on those documents. Upon information and belief, your client committed these fraudulent acts to justify a “need” for Internet number resources from ARIN. Furthermore, your client consolidated a large number of Internet number resources from shelf entities into Oppobox, LLC and has demonstrated a desire to monetize the fraudulently obtained Internet number resources both through completed transfers (Attachment C) and attempted but subsequently withdrawn transfers (Attachment B). These actions likely

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Mr. John McElwaine
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represent violations of 18 U.S. Code § 1341 and/or § 1343, and represent a material and intentional breach of Sections 2(c) and 2(d) of ARIN's Registration Service Agreement.

On, November 13, your client was given an opportunity to provide any facts or documents that might be relevant. Your client has failed to submit any such information. In response to the concerns you mentioned in your November 21 letter regarding what was called a "fishing expedition" by ARIN, we note that you do not have to provide any documents to ARIN at this point, but this is your last opportunity to do so.

ARIN demands that your client preserve all documents and communications related to Micfo's "Channel Partners" and representations made to ARIN, as well as the documents and communications related to the creation of the sham.

In accordance with Section 12 of ARIN's RSA, ARIN is willing to resolve this matter with you without the need to engage in costly arbitration proceedings. Accordingly, we had a Rule 408 discussion with you by telephone today. However, we want to make clear that if your client does not voluntarily agree by Friday, December 14, 2018, to a revocation of all the Internet number resources listed in Attachment A, ARIN will likely revoke these resources and take other appropriate actions. The Internet number resources in Attachment C would be included in this demand but for the fact that those resources have already been transferred. In the event of an arbitration regarding the revocation of resources, ARIN will not reissue the revoked resources during the pendency of the arbitration.

ARIN is not intending to take action on December 14th to revoke the Internet number resources provided to your client from 2011-2013. ARIN's review of this matter is ongoing, and ARIN will be evaluating what further steps are appropriate depending on your client's response to this letter.

Thank you for your prompt consideration of this important matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. Ryan", with a stylized flourish at the end.

Stephen M. Ryan, Esq.
ARIN General Counsel

cc: Michael R. Abejuela, Esq., *ARIN Associate General Counsel*

Enclosure

Attachment A – List of Resources

LEGEND

| | |
|----------------------|---|
| Org Name | The name of the organization that currently has the registration |
| Org ID | ARIN's "code" for the account associated with the registration |
| Resource | The Internet Number Resource registered to the organization; * indicates a resource that was issued from ARIN's IPv4 Waiting List |
| Resource Type | ASN = Autonomous System Number, IPv6 = Internet Protocol Version 6, IPv4 = Internet Protocol Version 4 |
| Date | The date the Internet Number Resource was issued or transferred to the organization |
| Ticket Number | ARIN's ticket number associated with the resource being issued/transferred |
| Obtained Via | Directly from ARIN or via a transfer from another organization |

| <u>Org Name</u> | <u>Org ID</u> | <u>Resource Type</u> | <u>Type</u> | <u>Date</u> | <u>Ticket Number</u> | <u>Obtained Via</u> |
|-----------------|---------------|----------------------|-------------|-------------|----------------------|-------------------------|
| OppoBox | OPPOB | AS20360 | ASN | 28-Jan-14 | 20140114-X144662 | Directly from ARIN |
| OppoBox | OPPOB | 2607:AA80::/32 | IPv6 | 28-Sep-16 | 20160921-X955918 | Directly from ARIN |
| OppoBox | OPPOB | 104.250.224.0/19 | IPv4 | 23-Dec-14 | 20141208-X455663 | Directly from ARIN |
| OppoBox | OPPOB | 104.207.64.0/19 | IPv4 | 26-Sep-14 | 20140908-X425612 | Directly from ARIN |
| OppoBox | OPPOB | 155.254.96.0/19 | IPv4 | 23-Jun-14 | 20140527-X337133 | Directly from ARIN |
| OppoBox | OPPOB | 107.190.160.0/20 | IPv4 | 17-Apr-14 | 20140311-X241341 | Directly from ARIN |
| OppoBox | OPPOB | 107.182.112.0/20 | IPv4 | 19-Feb-14 | 20140206-X189339 | Directly from ARIN |
| OppoBox | OPPOB | 45.41.192.0/18 | IPv4 | 5-Jun-18 | 20180226-X71712 | Transfer from UN-15 8.2 |
| OppoBox | OPPOB | 139.64.128.0/17* | IPv4 | 5-Jun-18 | 20180226-X71712 | Transfer from UN-15 8.2 |
| OppoBox | OPPOB | 172.110.128.0/18 | IPv4 | 5-Jun-18 | 20180226-X71712 | Transfer from UN-15 8.2 |
| OppoBox | OPPOB | 45.42.128.0/17 | IPv4 | 21-Feb-18 | 20180209-X70245 | Transfer from ROYAH 8.2 |
| OppoBox | OPPOB | 45.59.128.0/18 | IPv4 | 21-Feb-18 | 20180209-X70245 | Transfer from ROYAH 8.2 |

| <u>Org Name</u> | <u>Org ID</u> | <u>Resource Type</u> | <u>Type</u> | <u>Date</u> | <u>Ticket Number</u> | <u>Obtained Via</u> |
|-----------------|---------------|----------------------|-------------|-------------|----------------------|----------------------------|
| OppoBox | OPPOB | 104.224.0.0/18 | IPv4 | 21-Feb-18 | 20180209-X70245 | Transfer from ROYAH 8.2 |
| OppoBox | OPPOB | 136.175.0.0/16* | IPv4 | 21-Feb-18 | 20180209-X70245 | Transfer from ROYAH 8.2 |
| OppoBox | OPPOB | 172.99.128.0/17 | IPv4 | 21-Feb-18 | 20180209-X70245 | Transfer from ROYAH 8.2 |
| OppoBox | OPPOB | 45.41.0.0/18 | IPv4 | 5-Feb-17 | 20171208-X61808 | Transfer from VIRTU-80 8.2 |
| OppoBox | OPPOB | 104.247.96.0/19 | IPv4 | 5-Feb-17 | 20171208-X61808 | Transfer from VIRTU-80 8.2 |
| OppoBox | OPPOB | 163.123.128.0/17* | IPv4 | 5-Feb-17 | 20171208-X61808 | Transfer from VIRTU-80 8.2 |
| OppoBox | OPPOB | 172.111.0.0/18 | IPv4 | 5-Feb-17 | 20171208-X61808 | Transfer from VIRTU-80 8.2 |
| OppoBox | OPPOB | 45.45.128.0/17 | IPv4 | 3-Nov-17 | 20170831-X52752 | Transfer from CCL-293 8.2 |
| OppoBox | OPPOB | 104.167.192.0/18 | IPv4 | 3-Nov-17 | 20170831-X52752 | Transfer from CCL-293 8.2 |
| OppoBox | OPPOB | 104.249.128.0/18 | IPv4 | 3-Nov-17 | 20170831-X52752 | Transfer from CCL-293 8.2 |
| OppoBox | OPPOB | 155.254.192.0/18 | IPv4 | 3-Nov-17 | 20170831-X52752 | Transfer from CCL-293 8.2 |
| OppoBox | OPPOB | 172.82.0.0/17 | IPv4 | 3-Nov-17 | 20170831-X52752 | Transfer from CCL-293 8.2 |

| <u>Org Name</u> | <u>Org ID</u> | <u>Resource</u> | <u>Type</u> | <u>Date</u> | <u>Ticket Number</u> | <u>Obtained Via</u> |
|-----------------|---------------|-----------------|-------------|-------------|----------------------|---------------------|
| Univera Network | UN-15 | AS63262 | ASN | 27-Oct-14 | 20141015-X440503 | Directly from ARIN |
| Univera Network | UN-15 | 2607:EB80::/32 | IPv6 | 12-Dec-16 | 20160930-X956726 | Directly from ARIN |
| Univera Network | UN-15 | 104.237.80.0/20 | IPv4 | 11-Nov-14 | 20141015-X440505 | Directly from ARIN |
| Univera Network | UN-15 | 45.62.32.0/19 | IPv4 | 16-Jan-15 | 20141228-X459952 | Directly from ARIN |

| <u>Org Name</u> | <u>Org ID</u> | <u>Resource</u> | <u>Type</u> | <u>Date</u> | <u>Ticket Number</u> | <u>Obtained Via</u> |
|-----------------|---------------|-----------------|-------------|-------------|----------------------|---------------------|
| Roya Hosting | ROYAH | AS54334 | ASN | 1-Jul-14 | 20140603-X342977 | Directly from ARIN |
| Roya Hosting | ROYAH | 104.143.16.0/20 | IPv4 | 2-Jul-14 | 20140603-X342984 | Directly from ARIN |

| <u>Org Name</u> | <u>Org ID</u> | <u>Resource</u> | <u>Type</u> | <u>Date</u> | <u>Ticket Number</u> | <u>Obtained Via</u> |
|-----------------|---------------|------------------|-------------|-------------|----------------------|---------------------|
| Virtuzo | VIRTU-80 | AS30279 | ASN | 26-Mar-14 | 20140313-X245291 | Directly from ARIN |
| Virtuzo | VIRTU-80 | 2607:AB80::/32 | IPv6 | 30-Sep-16 | 20160928-X956476 | Directly from ARIN |
| Virtuzo | VIRTU-80 | 104.156.192.0/19 | IPv4 | 17-Jul-14 | 20140701-X379550 | Directly from ARIN |
| Virtuzo | VIRTU-80 | 104.128.128.0/20 | IPv4 | 3-Jun-14 | 20140508-X313755 | Directly from ARIN |
| Virtuzo | VIRTU-80 | 104.222.128.0/19 | IPv4 | 6-Oct-14 | 20140903-X424846 | Directly from ARIN |
| Virtuzo | VIRTU-80 | 167.88.96.0/20 | IPv4 | 28-Mar-14 | 20140313-X245306 | Directly from ARIN |

| <u>Org Name</u> | <u>Org ID</u> | <u>Resource</u> | <u>Type</u> | <u>Date</u> | <u>Ticket Number</u> | <u>Obtained Via</u> |
|------------------------|---------------|-------------------|-------------|-------------|----------------------|---------------------|
| Contina Communications | CCL-293 | AS63008 | ASN | 27-Dec-13 | 20131217-X105036 | Directly from ARIN |
| Contina Communications | CCL-293 | 167.160.96.0/19 | IPv4 | 19-Mar-14 | 20140227-X218597 | Directly from ARIN |
| Contina Communications | CCL-293 | 107.181.64.0/20 | IPv4 | 6-Feb-14 | 20140121-X159699 | Directly from ARIN |
| <u>Org Name</u> | <u>Org ID</u> | <u>Resource</u> | <u>Type</u> | <u>Date</u> | <u>Ticket Number</u> | <u>Obtained Via</u> |
| Fiber Galaxy | FG-74 | AS394021 | ASN | 26-May-15 | 20150512-X494225 | Directly from ARIN |
| Fiber Galaxy | FG-74 | 206.223.224.0/19* | IPv4 | 21-Feb-17 | 20150706-X508131 | Directly from ARIN |
| Fiber Galaxy | FG-74 | 172.97.80.0/20 | IPv4 | 15-Jun-15 | 20150512-X494223 | Directly from ARIN |
| <u>Org Name</u> | <u>Org ID</u> | <u>Resource</u> | <u>Type</u> | <u>Date</u> | <u>Ticket Number</u> | <u>Obtained Via</u> |
| Telentia | TELEN-24 | AS22676 | ASN | 21-Jan-14 | 20140106-X129883 | Directly from ARIN |
| Telentia | TELEN-24 | 64.112.0.0/17* | IPv4 | 21-Feb-17 | 20150716-X509370 | Directly from ARIN |
| Telentia | TELEN-24 | 172.98.0.0/18 | IPv4 | 12-Jun-15 | 20150512-X494140 | Directly from ARIN |
| Telentia | TELEN-24 | 174.136.192.0/18 | IPv4 | 12-Mar-15 | 20150210-X470476 | Directly from ARIN |
| Telentia | TELEN-24 | 104.247.0.0/19 | IPv4 | 24-Dec-14 | 20141211-X456584 | Directly from ARIN |
| Telentia | TELEN-24 | 104.222.192.0/19 | IPv4 | 8-Oct-14 | 20140901-X424587 | Directly from ARIN |
| Telentia | TELEN-24 | 104.143.192.0/19 | IPv4 | 10-Jul-14 | 20140616-X363465 | Directly from ARIN |
| Telentia | TELEN-24 | 104.128.16.0/20 | IPv4 | 20-May-14 | 20140428-X307015 | Directly from ARIN |
| Telentia | TELEN-24 | 209.161.96.0/20 | IPv4 | 7-Mar-14 | 20140217-X210488 | Directly from ARIN |

| <u>Org Name</u> | <u>Org ID</u> | <u>Resource</u> | <u>Type</u> | <u>Date</u> | <u>Ticket Number</u> | <u>Obtained Via</u> |
|------------------------|---------------|-------------------|-------------|-------------|----------------------|---------------------|
| Border Technology, LLC | BTL-86 | AS11029 | ASN | 30-Dec-14 | 20141223-X459001 | Directly from ARIN |
| Border Technology, LLC | BTL-86 | 2604:B640::/32 | IPv6 | 23-Mar-18 | 20180313-X73203 | Directly from ARIN |
| Border Technology, LLC | BTL-86 | 169.197.128.0/18* | IPv4 | 28-Dec-16 | 20150622-X504886 | Directly from ARIN |
| Border Technology, LLC | BTL-86 | 172.81.0.0/18 | IPv4 | 11-May-15 | 20150417-X487882 | Directly from ARIN |
| Border Technology, LLC | BTL-86 | 173.44.0.0/19 | IPv4 | 6-Mar-15 | 20150216-X471891 | Directly from ARIN |
| Border Technology, LLC | BTL-86 | 45.61.32.0/20 | IPv4 | 5-Jan-15 | 20141223-X459002 | Directly from ARIN |
| <u>Org Name</u> | <u>Org ID</u> | <u>Resource</u> | <u>Type</u> | <u>Date</u> | <u>Ticket Number</u> | <u>Obtained Via</u> |
| Fairway Network, Inc. | FN-184 | AS394143 | ASN | 22-Jun-15 | 20150527-X498159 | Directly from ARIN |
| Fairway Network, Inc. | FN-184 | 2604:C40::/32 | IPv6 | 12-Jan-17 | 20170110-X965961 | Directly from ARIN |
| Fairway Network, Inc. | FN-184 | 207.189.0.0/19* | IPv4 | 21-Feb-17 | 20150721-X509940 | Directly from ARIN |
| Fairway Network, Inc. | FN-184 | 172.110.208.0/20 | IPv4 | 25-Jun-15 | 20150527-X498160 | Directly from ARIN |

Attachment B – Attempted Transfers

LEGEND

| | |
|-----------------------|--|
| Org Name | The name of the organization that currently has the registration |
| Org ID | ARIN's "code" for the account associated with the registration |
| Resource | The Internet Number Resource registered to the organization |
| Resource Type | ASN = Autonomous System Number, IPv6 = Internet Protocol Version 6, IPv4 = Internet Protocol Version 4 |
| Date | Date the Internet Number Resource was requested to be transferred |
| Ticket Number | ARIN ticket number for the transfer request |
| Date Withdrawn | Date the transfer request was withdrawn |

| <u>Org Name</u> | <u>Org ID</u> | <u>Resource</u> | <u>Type</u> | <u>Date</u> | <u>Ticket Number</u> | <u>Date Withdrawn</u> |
|-----------------|---------------|-----------------|-------------|-------------|----------------------|-----------------------|
| OppoBox | OPPOB | 45.45.128.0/17 | IPv4 | 19-Oct-18 | 20181019-X228786 | 13-Nov-18 |
| OppoBox | OPPOB | 45.42.128.0/17 | IPv4 | 19-Oct-18 | 20181019-X228786 | 13-Nov-18 |
| OppoBox | OPPOB | 172.82.0.0/17 | IPv4 | 19-Oct-18 | 20181019-X228786 | 13-Nov-18 |
| OppoBox | OPPOB | 172.99.128.0/17 | IPv4 | 19-Oct-18 | 20181019-X228786 | 13-Nov-18 |

Attachment C – Completed Transfers

LEGEND

| | |
|-----------------------|--|
| Org Name | The name of the organization that held the registration |
| Org ID | ARIN's "code" for the account associated with the registration |
| Resource | The Internet Number Resource transferred from the organization; * indicates a block issued from ARIN's IPv4 Waiting List |
| Resource Type | ASN = Autonomous System Number, IPv6 = Internet Protocol Version 6, IPv4 = Internet Protocol Version 4 |
| Date | Date the Internet Number Resource was requested to be transferred |
| Ticket Number | ARIN ticket number for the transfer request |
| Date Completed | Date the transfer request was completed |

| <u>Org Name</u> | <u>Org ID</u> | <u>Resource</u> | <u>Type</u> | <u>Date</u> | <u>Ticket Number</u> | <u>Date Completed</u> |
|-----------------|---------------|-------------------|-------------|-------------|----------------------|-----------------------|
| OppoBox | OPPOB | 45.40.192.0/18 | IPv4 | 3-May-17 | 20170503-X42127 | 28-Jun-17 |
| OppoBox | OPPOB | 172.81.192.0/18 | IPv4 | 3-May-17 | 20170503-X42127 | 28-Jun-17 |
| OppoBox | OPPOB | 192.144.128.0/17* | IPv4 | 3-May-17 | 20170503-X42127 | 28-Jun-17 |
| OppoBox | OPPOB | 98.126.0.0/16* | IPv4 | 8-Jun-18 | 20180608-X81894 | 5-Jul-18 |